

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

AARON GLAESER,

Plaintiff,

v.

CHEATHAM COUNTY, TN &
JASON LITTLEJOHN

Defendants.

CASE NO. 3-05-1043
JUDGE WISEMAN/JUDGE GRIFFIN

DEFENDANT JASON LITTLEJOHN'S
RESPONSES TO PLAINTIFF'S INTERROGATORIES

For his response to the Plaintiff's Interrogatories, the Defendant, Jason Littlejohn, would state as follows:

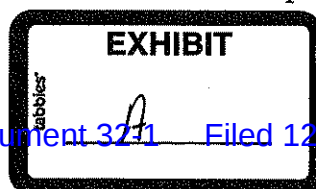
1. Please state your full name, address and present employment.

ANSWER: Full Name: Deputy Jason Littlejohn
Address: 200 Court Square
Ashland City, TN 37015
Employment: Cheatham County Sheriff's Department

2. State your date of birth, driver's license number, social security number, and what other names you have gone by during your lifetime.

ANSWER: Date of Birth: January 23, 1976
Driver's License: TN 77674870
I have not gone by any other names or aliases.

3. State the name and address of the owner and all occupants of the vehicle that you were operating at the time of the incident described in the Complaint.



ANSWER: The owner of the vehicle that I was operating at the time of the incident was the Cheatham County Sheriff's Department. There were no other occupants in the vehicle.

4. State the name and address of each person, including experts, having any knowledge of relevant facts related to the collision that is the basis of this suit, its cause or the damages resulting from it.

ANSWER: This defendant has not retained any expert witness(es) at this time. Following are all person(s) having knowledge of the relevant facts in this matter:

1. Jason Littlejohn
Cheatham County Sheriff's Department
200 Court Square
Ashland City, TN 37015
2. Aaron Glaeser
5921 Lickton Pike
Goodlettsville, TN 37072
3. Charles Parker
1054 Waynoe Road
Ashland City, TN 37015
4. Sheriff John Holder
Cheatham County Sheriff's Department
200 Court Square
Ashland City, TN 37015
5. Chief Tim Binkley
Cheatham County Sheriff's Department
200 Court Square
Ashland City, TN 37015
6. Sergeant Bamman
Cheatham County Sheriff's Department
200 Court Square
Ashland City, TN 37015
7. Patrolman Jeremy Long
Ashland City Police Department
Ashland City, TN 37015
8. Nicholas L. McCloud
106 Joey Lane
Ashland City, TN 37015
9. Deputy Carl Lytle

Cheatham County Sheriff's Department
200 Court Square
Ashland City, TN 37015

10. Deputy Paul Miranda
Cheatham County Sheriff's Department
200 Court Square
Ashland City, TN 37015
11. Deputy Floyd Duncan
Cheatham County Sheriff's Department
200 Court Square
Ashland City, TN 37015

5. State the name, address and qualification of each expert whom you expect to call as an expert witnesses at the trial of this case, and the subject matter concerning which the expert expects to testify. Also, attach a copy of any report, including factual observations and opinions, that has been prepared by any such expert.

ANSWER: This defendant has not retained any expert witness(es) at this time.

6. If your response to Interrogatory No. 5 is affirmative, for each such person, entity and/or thing:

- a. Identify the person, entity and/or thing;
- b. State the factual basis for your contention that the person, entity and/or thing contributed to cause the incident, injuries and/or losses described in the complaint; and
- c. Identify each person who has knowledge or claims to have knowledge of any such facts.

ANSWER: See answer to interrogatory 5, above.

7. Do you contend that any person, entity or thing contributed to cause the incident, injuries and/or losses described in the Complaint?

ANSWER: Yes. The plaintiff contributed to cause the incident, injuries and/or losses described in the complaint.

8. Please state whether you have a cop of any statement that the Plaintiff has previously made concerning the action or its subject matter and that is in your possession, custody or control. (For the purpose of this question, a statement previously made is (1) a written statement signed or otherwise adopted or approved by the person making it or (2) a stenographic, mechanical, electrical, or other recording or a transcription that is substantially verbatim recital of an oral statement by the person making it and contemporaneously recorded.

ANSWER: There was no statement obtained from the plaintiff.

9. Describe any insurance agreement under which any insurance business may be liable to satisfy part or all of the judgment that may be entered in this action, or to indemnify or reimburse for payments made to satisfy the judgment, by stating the name of the insurer.

ANSWER: The Cheatham County Sheriff's Department is insured by the Tennessee Risk Management Trust.

10. Describe in your own words how the incident occurred and state specifically and in detail what the claim or contention of the Defendant will be regarding any cause or contributing cause of the incident, including a statement in detail of the facts or information upon which this information is based.

ANSWER: On Sunday the 12th day of December, I was patrolling Bandy Road when two vehicles passed me doing 61 miles per hour with one vehicle tailgating the other. I turned around to catch back up and attempted to stop the vehicles. I had my emergency equipment on and they still failed to stop. We made a right turn on Valley View Road and one vehicle passed the other. I lost sight of the first vehicle. The second vehicle I was chasing turned onto Waynoe Road. The first vehicle was also on Waynoe Road, which is a dead end road. When I got to the end, both vehicles were stopped. I drew my weapon and exited my patrol car. The dark car then turned around and was heading straight for me and was not slowing down. I started firing shots and moved out of the way. I then radioed Central that shots were fired and the vehicle kept going. I

focused on the vehicle that was still at the scene and made the driver get out of the car and placed him in custody. At that time, another deputy showed up and took over the scene.

11. State the speed of your vehicle at all times material to the incident in question, including specifically your speed at the time of the incident.

ANSWER: During the pursuit I was traveling 45 miles per hour. At the time of the incident, I was traveling 0 miles per hour.

12. Describe in detail what damage, if any, was done to your vehicle in the incident, and give the cost of repair to your vehicle.

ANSWER: None.

13. Describe in detail what injuries, if any, you received in the incident.

ANSWER: None.

14. Describe in detail any conversations you have had with the Plaintiff following the incident in question.

ANSWER: None.

15. State whether or not you were the operator or an occupant of a vehicle that was involved in the incident described in the Complaint.

ANSWER: I was the operator of the vehicle that was involved in the incident.

16. State whether you were acting within the course and scope of any agency, employment, or service at the time of the incident, and describe the type of relationship of the persons involved.

ANSWER: I was acting in the course and scope of my employment with the Cheatham County Sheriff's Department.

17. State the date, place and cause for any arrests or grand jury investigations ever suffered by you, and the final disposition of any charges or potential charges, including but not limited to, pretrial diversion or any other pretrial disposition.

ANSWER: None.

Respectfully submitted,

ORTALE, KELLEY, HERBERT & CRAWFORD

W. Carl Spining by Adam H. Brown
W. CARL SPINING, # 16302
Attorney for Defendants
200 Fourth Avenue North
Third Floor - Noel Place
P.O. Box 198985
Nashville, Tennessee 37219-8985
(615) 256-9999

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was forwarded via United States Mail, postage prepaid, to: Adam Wilding Parrish, Esq., 110 South Cumberland, Lebanon, Tennessee 37087 on this the 27th day of September, 2006.

W. Carl Spining by Adam H. Brown
W. Carl Spining

STATE OF TENNESSEE

COUNTY OF Davidson

I, JASON LITTLEJOHN, make oath that the facts stated in the foregoing Answers to Interrogatories are true to the best of my knowledge, information and belief.

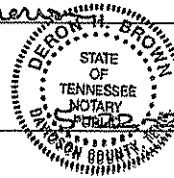
SWORN TO AND SUBSCRIBED before me this the 22nd day of September, 2006.

Jason Littlejohn

Deron H. Brown

Notary Public

My Commission Expires:



NOTARY PUBLIC
Deron H. Brown
My Commission Expires
May 22, 2010
STATE OF TENNESSEE